IN THE UNITED STATES

PATENT AND TRADEMARK OFFICE

APPLICANT: Brett Error and John Pestana

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TITLE: CAPTURING AND PRESENTING SITE VISITATION PATH DATA

EXAMINER: Kavita Padmanabhan

GROUP ART UNIT: 2161

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REPLY BRIEF

This Brief is in reply to the Examiner's Answer mailed October 4, 2007.

Argument

This Applicants' Response to the Examiner's Answer is necessitated because of

errors and inaccuracies in the Examiner's Answer.

The Rejections of Claims Under 35 U.S.C. § 102(e) Should Be Reversed

Claims 12-21, 33-42, and 54-63 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Kasriel (U.S. Patent App. Pub. 2003/0128231). This rejection is respectfully traversed.

Claims 12, 33, and 54 (and their respective dependencies)

Claim 12 is representative of claims 12, 33, and 54 for the purposes of the discussion below, and recites:

> "A computer-implemented method for capturing and presenting node sequence data, comprising:
>> receiving input designating a target path comprising a sequence of nodes, the target path further comprising at least one wild card;
>> retrieving, from a stored log, a plurality of records comprising node sequence data;
>> filtering the retrieved records to identify records corresponding to node sequences that match the target path; and
>> outputting a report based on the identified records."

The Examiner argued that Kasriel teaches "receiving input designating a target path comprising a sequence of nodes, the target path further comprising at least one wild card." Specifically, the Examiner stated that such a teaching can be found at paragraph [0033] of Kasriel, which reads in part, "The particular traversal to or from the target location may also be specified, to include, for example, transactions wherein the target location is the entry location of an access to the web-site, or transactions wherein the target location was visited at some time during the access to the web-site, or transactions wherein the target location was the exit location of an access to the web-site", and at paragraph [0035], which reads in part, "'all accesses to the web-site from

"yahoo.com" wherein the visitor entered the web-site via "page A", and visited "page B or C."""

On the contrary, nowhere in these paragraphs does Kasriel provide any teaching or suggestion that provides the distinctive functionality, flexibility, and analytical power of the wild card concept as used and recited in the claims.

The specification defines a wild card as a part of a pattern mask that can be used to specify a target path. See paragraphs [0045] through [0048]. In the context of a pattern mask that includes nodes to be matched, a wild card is a position within the pattern mask where any node or nodes can be found and the target pattern will still be considered a match. Hence the language of paragraph [0048] of the specification, which states that "Wild cards match any page" within the context of a pattern mask.

Thus, in the context of a pattern mask where some nodes are specified, wild cards can match any page. If a wild card is specified before or after a specified node, one or more nodes can be found at the specified location and the pattern will still match. If no wild card is specified before or after a specified node, any extraneous (or "tangential") nodes found at that location will invalidate a match.

The wild card, as defined in the specification, thus provides a mechanism for pattern matching that is far more powerful than that permitted by Kasriel. A particular sequence of nodes, in a particular order, can be specified, while still allowing for tangential nodes to be visited <u>at particular positions in the sequence</u>, and while <u>disallowing</u> tangential nodes at other positions in the sequence. In addition, wild cards allow for specification of a particular number of tangential nodes between two defined

nodes. None of these limitations require any reading from the specification, as they are inherent in the concept of "wild card" as well known in the art of pattern matching and as consistently defined in the specification.

A careful reading of Kasriel reveals that no such concept is taught or facilitated. Kasriel allows for specification of the entry or exit location of an access to a web-site. Kasriel further allows for specification of visitation of particular target locations at some time during the access – but Kasriel does not provide any way to define a <u>sequence of visitation</u> of such target locations. The example cited by the Examiner (from paragraph [0035]) merely indicates that page A was the entry page and that one of pages B or C was visited at some point during the visit to the web-site. Without being able to specify a wild card, there is no way for Kasriel to define a <u>sequence</u> of such traversal, where tangential pages could be permitted or not permitted as appropriate.

In short, Kasriel's examples reveal an extremely rudimentary form of page visitation matching. Entry and exit pages can be specified, as can particular pages that appear during the course of the visit to the website. What is missing from Kasriel is a technique for specifying a <u>sequential traversal path</u>, of any desired length, that selectively permits tangential nodes to be visited <u>at some points on the path but not others</u>, and that allows <u>a particular number of tangential nodes</u> to be specified if desired. The wild card concept of the present invention permits such a specification. Since Kasriel does not mention wild cards and does not describe any analogous or equivalent concept, Kasriel is unable to provide the functionality enabled by the claimed invention.

The Examiner stated that Kasriel's teaching at paragraph [0035], wherein in a user may request "'all accesses to the web-site from "yahoo.com" wherein the visitor entered the web-site via "page A", and visited "page B or C.,"'" clearly teaches the concept of a wild card. To the contrary, this quotation fails to teach a wild card. The wild card is defined in the specification of the present application at paragraph [0048] as being capable of indicating a single node or zero or more nodes. Examples are given in the specification to further clarify this definition. Kasriel fails to teach a wild card representing zero or more nodes (a "*" wild card), because its teaching only includes the special case of an initial node (A) and some other node selected from a set (B or C). Kasriel would therefore fail to provide any mechanism whereby a wild card could be specified at any point in the target path. In particular, the teaching of Kasriel offers no mechanism by which a wild card representing a single node can be specified (a "?" wild card), so that only a single node in the defined position would match, and so that too many or too few nodes would fail to match.

Kasriel's mention of a particular traversal to or from the target location is irrelevant to the discussion herein, since Kasriel does not make any mention of the use of wildcards in the context of the traversal to or from the target location.

The Examiner stated that Kasriel allows for additional pages to be visited at specific points on the path but not at other points. Specifically, Kasriel specifies an entry page and thus does not permit any additional pages before the entry page. However, this limited ability of Kasriel to specify pages at certain points on the path (e.g. entry and exit pages) does not rise to the level of a wild card, because it does not

provide any generalized mechanism for specifying points on the path where tangential nodes are permitted. In other words, Kasriel's ability to specify entry and/or exit pages does not in itself provide any equivalent to the wild card concept of the present invention.

The Examiner repeatedly stated that although "the claims are interpreted in light of the specification, limitations from the specification are not read into the claims." Applicants stress that they are not attempting to read limitations from the specification into the claims. The claims use the term "wild card" to refer to a specific concept with specific attributes. The notion of a wild card is well-defined in the specification, for example at paragraph [0048] and by example in the paragraphs following. In addition, the usage of the term is consistent with well-known definitions of the term that can be found in external sources referring to pattern matching techniques. It is well known, in text pattern matching for example, to use an asterisk wild card ("*") to refer to zero or more characters and to use a question mark wild card ("?") to refer to a single character.

Applicants respectfully point out, therefore, that rather than attempting to read any limitations from the specification into the claims, Applicants are merely using the discussion in the specification to further illuminate what is meant by the term "wild card."

Conclusion

Applicants submit that claims 12-21, 33-42, and 54-63 as pending are patentable over the cited reference. The Examiner's rejection of claims 12-21, 33-42, and 54-63 is

erroneous, and Applicants respectfully request that the Board reverse the grounds for

rejection of all appealed claims.

Respectfully submitted,

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Dated: November 28, 2007   By: / Amir H. Raubvogel /
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